


FILED
AUG 17 2005

CLERK

UNITED STATE DISTRICT COURT FOR THE
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

vs.

KRISTEN LYNNE SCHULZ, BENJAMIN
MOON, AND STEVEN CRAIG
ALEXANDER Defendant

) Case No.: CR 05-M34-03

) MOTION FOR DISCLOSURE OF OTHER
) BAD ACTS EVIDENCE


Comes now the Defendant, Steven Craig Alexander, by and through his attorney,
Gary W. Conklin, and respectfully moves the Court for its Order directing the
Government to disclose to Defendant whether it intends to offer at trial any evidence of
other crime, wrongs, or bad acts:

1. A brief description of the nature of the crime, wrong or bad act.
2. The date and place of the commission of such act.
3. The names, addresses and telephone numbers of all of the witnesses who will
testify to such act.
4. Any tangible evidence which the Government intends to use in connection
with proving such act.
5. The purpose for which such evidence will be offered under Fed.R.Evid.

In the event the Government does intend to offer evidence under Fed.R.Evid.
404(b), the Defendant's Response to the Motion may not come prior to the deadline set
for the filing of all of Defendant's Pre-Trial Motions. Therefore, the Defendant reserves
the right to file a Suppression Motion or Motion in Limine regarding any evidence
divulged by the Government in response to this Motion.

This Motion is made pursuant to the spirit of Fed.R.Crim.P. 2 and Fed.R.Crim.P. 12, so that the Defendant may adequately prepare objections to such evidence, and Memoranda of Law on the points of law raises, prior to the time set for trial herein, and to minimize the potential disruption of the trial to determine questions of admissibility of evidence.

Dated this 17th day of August 2005.



Gary W. Conklin, Attorney for
Defendant Steven Craig Alexander
300 N. Dakota Ave. # 608
Sioux Falls SD 57103
605-978-0036
605-978-0064 FAX


CERTIFICATE OF SERVICE

This is to certify that on this 17th day of August 2005, by regular United States Mail, postage prepaid, first class, I mailed a true and correct copy of the above MOTION FOR DISCLOSURE OF OTHER BAD ACTS EVIDENCE to

Mr. John Haak, Attorney
Office of United States Attorney
PO Box 5073
Sioux Falls SD 57117-5073

Mr. James A. Eirinberg, Attorney
300 N. Dakota Ave. # 509
Sioux Falls, SD 57104

Mr. Michael W. Hanson, Attorney
505 W. 9th St. #100
Sioux Falls, SD 57104



Gary W. Conklin, Attorney for Steven Craig Alexander